

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

<p>In re:</p> <p>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</p> <p>As representative of</p> <p>THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i></p> <p>Debtors.<sup>1</sup></p>	<p>PROMESA</p> <p>Title III</p> <p>No. 17-BK-3283 (LTS)</p> <p>(Jointly Administered)</p>
<p>In re:</p> <p>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</p> <p>As representative of</p> <p>PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY,</p> <p>Debtor.</p>	<p>PROMESA</p> <p>Title III</p> <p>No. 17-BK-3567 (LTS)</p>

**UNIVERSITY OF PUERTO RICO RETIREMENT SYSTEM TRUST RESPONSE TO  
FIVE HUNDRED SIXTY-SIXTH OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF  
THE COMMONWEALTH OF PUERTO RICO TO SUBSEQUENTLY AMENDED AND  
SUPERSEDED CLAIMS AND RESERVATION OF RIGHTS**

**TO THE HONORABLE COURT:**

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); and (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686).

**COMES NOW** creditor University of Puerto Rico Retirement System Trust (the “Trust”), through the undersigned counsel, and respectfully states and prays as follows:

1. On June 29, 2018, the Trust timely filed Proof of Claim No. 93752 against the Commonwealth of Puerto Rico.

2. On October 26, 2021, the Trust amended Proof of Claim No. 93752, which was classified as Proof of Claim No. 179672.

3. On October 29, 2021, Debtors filed the Nineteenth Notice of Transfer of Claims to Administrative Claims Reconciliation through which the Trust’s Proof of Claim No. 93752 was transferred into ACR. See Docket No. 18956.

4. On April 18, 2023, Debtors filed the Thirty-First Notice of Transfer of Claims to Administrative Claims Reconciliation through which the Trust’s amended Proof of Claim No. 179672 was transferred into ACR. See Docket No. 24019.

5. On April 20, 2023, Debtors filed the Five Hundred Sixty-Sixth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico to Subsequently Amended and Superseded Claims (the “Objection”) in which the Debtors are requesting the disallowance of Proof of Claim No. 93752 given that it was amended and/or superseded by amended Proof of Claim No. 179672. The Objection states that the claim to be disallowed will not prejudice the Trust given it will retain the amended Proof of Claim No. 179672.

6. On May 10, 2023, Debtors filed a Notice of Removal of Certain Claims from Alternative Dispute Resolution and Administrative Claims Reconciliation in which the Debtors remove Proof of Claim No. 93752 from ACR Procedures given that such claim is being resolved through the Objection. See Docket No. 24181.

7. The Trust recognizes that Proof of Claim No. 93752 was subsequently amended and superseded by Proof of Claim No. 179672, which has now been transferred to ACR.

8. The Trust does not object to the non-substantive disallowance of Proof of Claim No. 93752. However, the Trust's acquiescence to such disallowance shall not be construed as a waiver of the Trust's rights over the amended Proof of Claim No. 179672.

9. In light of the foregoing, the Trust files this Response and Reservation of Rights in an abundance of caution. Specifically, the Trust reserves all rights and claims over the allowance of amended Proof of Claim No. 179672 to the extent that the Objection directly or indirectly affects such claim.

**WHEREFORE**, the University of Puerto Rico Retirement System Trust respectfully requests that the Court take note of the above reservation of rights.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 22<sup>nd</sup> day of May 2023.

**WE HEREBY CERTIFY** that on this same date we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send electronic notification of such filing to all counsel of record. I also hereby certify that the foregoing was served pursuant to the Sixteenth Amended Notice, Case Management and Administrative Procedures Order (Docket No. 20190).

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